

Federal Highway Administration
Dept. of Transportation
400 7th St. RM 4232
WASHINGTON DC. 20590

12/7/96

Gerry Dinnauer
1651 Margeo Dr
Neenah, WI 54956 1745

96 DEC 12 09:37

LEADS/REGS. DIV.

Please consider my comments regarding FHWA
Docket # MC 96-28. In regards to drivers
hours of service. There is a need to bring
the hours of service into the 1990's and beyond
and out of the 1950's. With modern trucks
highways and higher horsepower engines it is
easier to do more with less fatigue.
One way to cut down on driver fatigue is to get
the driver off of the loading docks and make
the shipper and receiver responsible for load
count, sorting, palletizing and other work that
takes away from the drivers day & sleep time.
When I recieved my CDL I was under the
impression it stood for Commercial Drivers License.
NOT Combination Driver Lumper.

Make it a priority to eliminate split speed
limits there is more stress created with
this arrangement than you could believe.
If you don't think it's stressful try it
yourself sometime. Drive 55 MPH and let
the rest of the traffic do there thing.

Thank you for taking my comments

Sincerely Gerry Dinnauer

QA-2/394

F HWA-97-2350-7

DOCKET MC-96-28-7

PAGE 1 OF 1

FHWA Docket No. MC-96-28
FHA DOT
400 Seventh St, SW, Room 4232
Washington, DC 20590

RECEIVED
ADMINISTRATION

To whom it may concern,

96 DEC 8 10:07

RE: Comment about hours of service. Rules & more rules? Won't help.

What is the difference whether you work for ~~12 hours~~ ^{15 hours} or drive for 12 hours? There are many jobs where a person works 12 hours a day. Yet truck drivers are limited to 10 hours a day driving? I think this limit should be raised to allow at least 12 to 15 hours driving a day.

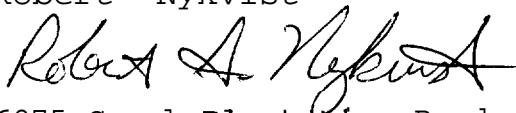
If you FHA people really want to attack issues that concern driver and public safety, then find out the real problems at hand. Name me the first product available that tests for carbon monoxide levels in a truck. None. What the statisticians want to do is classify many accidents as fatigue related, when in fact, the driver was overcome by carbon monoxide fumes. I've been victim to such poisoning, both in home, and in vehicle because of worn out products. Doctors couldn't even find the cause of side effects. One symptom of carbon monoxide poisoning is a sudden and uniquely strong urge to close the eyes. It is much different from fatigue. No amount of sleep or rest will remedy a leaky exhaust problem. We need carbon monoxide detectors in trucks to monitor for this otherwise undetectable poison.

Sometimes a person can drive for 12 hours in an alert state. Other times they can feel sleepy after only an hour in the driver's seat. One of the major problems drivers face is when they do get tired, there is no place to pull over to get needed rest. Rest areas can be hours apart, and most are usually filled beyond capacity leaving no room for parking a big truck when a person needs rest the most. The same over crowding exists in truck stops. When we get tired, we need rest then, not two to five hours later when a spot can be found to park. If I drive for nine hours, and then it takes five hours to find a vacant parking place, whose fault is it for violation of the 10 hour of driving rule? If you really want to help curb fatigue accidents, you can help by providing more facilities along the interstates **and state** highways for drivers. Especially large parking areas that trucks can fit in.

I don't need more rules and enforcement. I need adequately spaced parking facilities so that I won't have to keep driving when my body tells me to stop. I need a carbon monoxide detector for my truck to alert me of dangerously high levels of deadly exhaust inside the cab. Stop being so nit-picky about how many hours someone drives and listen to the needs of truck drivers. None of us wish to die because of fatigue either.

11/29/96

Robert Nykvist



6275 Carol Plantation Road
Lot - 6,
Theodore, AL 36582
Schneider National Carriers
Driver# 47243

DOCKET MC-96-28-8
PAGE 1 OF 1

To the members of The General Counsel

It is obvious that the old ^{96/REGS} of service system is out dated and out of touch with Today's needs ^{ADMINISTRATION} of the american trucker. ^{410:31}

The following is my oppinion of how things could be changed To benefit all who would be affected by any changes.

I would like to see changes in the hours of service as follows:

12 hrs on duty, 8 hrs off duty after an 8 hr break ^{driver} a would have a new 12 hrs on duty.

Once the driver reaches 80hrs, it would be manditory that the driver take a "24 hr." shut down. Once the 24hr shut down is complete, the hours of service would then revert back to "0"

If a driver completes a "24hr shutdown" anytime during the 80hrs of service, the hours of service would revert back to "0" also.

If a driver completes 2 consecutive 80hr services, upon fulfilling the 2nd 80hr service the driver would then be required to shut down "48" consecutive hours.

As for regulation of shippers and receivers, I feel strongly that they should be required to load and unload "all" freight. This is an area that has, indeed, been abused for many years. Drivers are being pushed to their limits to make a delivery on time, only to find out when they get there, that they must unload or load their own trailer, sometimes spending 8 or 10 hrs more on the dock trying to get M.T.

If a rule ~~were~~ such as I've straightened were enforced, it would not only allow drivers to get the rest they need, in turn making the highways safer, it would also create jobs. Badly needed jobs at that.

In closing I would like to express my appreciation for your allowing comment from the men and women who are actually in the "trenches." Perhaps this will give you a better picture of ~~how~~ things really work out here.

Thank you very much

Sincerely,

Matthew J. Cammit

C513-5506-0308

634 S. 1st

Carleton, IL. 61520

DOCKET MC-96-28-9 COL

PAGE 2 OF 2

DOCKET # MC 96-28

U.S. FHWA / GENERAL COUNCIL

Re: Hours of Service regulations

ADMINISTRATIVE
96 DEC 9 AIO 231
LEGS/REGS. DIV.

FROM: DONALD O. WIRTH
5170 KINGS CORNERS RD
ROMULUS N.Y. 14541

The current rules do NOT ensure safety on the highways - they only invite subversion by drivers trying to earn a living while also furthering the temptation of law enforcement to treat violations of the rules as a source of revenue.

Real highway safety has always been and will always be, regardless of regulation, the tangible result of conscientious, attentive, considerate, defensive drivers. The millions of miles driven every day by these good drivers is testimony to their capacity for self monitoring.

These good drivers support the efforts of police to stop excessive speeding, tail gating and abuses of the right of way by that small percentage of drivers who by their abuse create the abundance of incidents and accidents on our roadways.

Better education along with consistent good law enforcement and strong penalties given to those who continue to compromise safety is preferable to any arbitrary regulation.

Therefore, I support the development of sensible guidelines for drivers, shippers, receivers and carriers with suitable penalties for abusers and the abolishment of log books and the hours of service regulations.

DOCKET MC-96-28-10

PAGE 1 OF 1



DONALD O. WIRTH

November 16, 1996
67 Spruce Road
Reading, Massachusetts 01867

Docket Number MC 96-28
Attn: Office of the General Counsel
FHWA
400 Seventh Street, SW
Washington, DC 20590

96 DEC 12 PM 2:40
LEGIS./REGS. DIV.
ADMINISTRATION

Re: Hours of Service
Regulation of Shippers and Receivers

First, I would like to address the issue of "hours of service" regulations. It is a fact that fatigued equipment operators experience a decline in judgement ability and reflexes. When the equipment operator is a truck driver, sitting atop an 80,000lb mountain of iron moving down the highway at 65 mph, any lapse in judgement or reflex can be disastrous. The trucking industry today is operating on razor thin margins. Due to industry overcapacity, increasing freight rates is not a viable option for trucking companies. Within these operating parameters, the only method trucking companies have to increase profits is by increasing the miles per day traveled or loads per day hauled by each piece of equipment. As a result of this, they tend to pressure the truck drivers and owner/operators to "run faster, run longer, and run harder". Within this breeding ground of operator fatigue, the "hours of service" regulations are the only protection available to the truck driver and the motoring public. My experience as a driver has led me to the conclusion that there are two problems with the "hours of service" regulations:

1) The provision that allows for 15 hours of total "on duty" time (FMC Safety Regs 395.3,a,2). interestingly, the provision that allows for 10 hours of driving has never been a problem for me or any of my associates.

2) The 15/8 (395.3,a,2) and 10/8 (395.3,a,1) provisions that allow a driver to return to driving status after 8 hours of rest following a 15 hour "on duty" or 10 hour "driving" shift.

The 15 hour "on duty" status effectively creates a 15 hour work day. It is quite unrealistic to assume a human being can work that long without being overcome by fatigue. In the truck drivers case, his 15 hour day often includes; physically loading and unloading the truck, poor diet, inability to expel bodily waste on a regular basis, and stress induces by the uncontrollable driving habits of other motorists.

The 15/8 and 10/8 provisions make it impossible for human beings to adapt to a regular work/rest schedule. These provisions create a 10 hour on/8 hour off (or 15 on/8 off) cycle that force the trucker to become both a day and night shift worker without allowing him the time needed to adapt to either shift. Numerous studies have shown that interruption with the human bodies circadian rythm cycle creates a situation in which the body cannot receive "quality" rest, hence fatigue. For example, using the 10/8 rule, a drivers work week could be as follows:

Day	Working hours
Monday	5:00am to 3:00pm
Monday/Tuesday	11:00pm to 9:00am
Tuesday/Wednesday	5:00pm to 3:00am
Wednesday/Thursday	11:00am to 9:00pm
Thursday/Friday	5:00am to 3:00pm
Friday/Saturday	11:00pm to 9:00am

**at this point the driver has used

DOCKET MC-96-28-11
PAGE 1 OF 3

up all his allowable hours in a
7 day week under the 60/7 rule
(395.3, b, 1)

I believe the FWA should adopt a 12/12 rule; 12 hours "on duty" then "12 hours "off duty". The 12 hours "on duty" should include the three categories that currently comprise the trucker's ~~time status when he is not "off duty": they are "driving", "sleeper berth", and "on duty".~~ This system would create a more stable work environment in which the driver's body could adapt to regular rest periods. A driver would either be a first shift or a second shift driver. It is imperative, for public safety reasons, that no exceptions be granted to this rule. I realize that currently spokespeople for individual industries (specifically agriculture and construction) are lobbying for exemption from the "hours of services" rules due to the "special demands" of their industries. Please bear in mind that a truck loaded with produce or cement will slam into a family minivan with the same horrible, destructive force as a truck loaded with chemicals or lumber.

This rule would benefit all the parties directly involved. Truck drivers would be less fatigued, safer operators. The motoring public would be safer. The government may be able to take credit for this as "job creation act" because trucking companies may be motivated to hire more drivers to satisfy all their freight movement demands in two regular shifts. Finally, the trucking companies may benefit. Driver's ability to work regular, fixed shifts may increase their morale. This could reduce the costly problem of driver retention faced by many trucking companies. Alert drivers are more likely to avoid accidents so companies can avoid the costly litigation associated with them. Happy, rested drivers convey a better image of the company and would be more inclined to go that extra step to ensure customer satisfaction where the trailer meets the dock.

Second, I would like to address the issue of regulation of shippers and ~~recievers~~. With the advent of trucking deregulation and the decline in Teamster power and influence, loading and unloading trucks has become one of the truck drivers duties. This occurs because shippers and receivers, in their efforts to reduce their costs, are able to force the cost of loading/unloading labor back onto the trucking companies. The trucking companies, in a short sighted effort to "remain competitive", maintain that the use of drivers to load and unload is a "value added" service to the customer. In reality, no value is added, since they cannot raise their rates to cover ~~the cost of having drivers perform non driving work. The bottom line for the trucker is that he often must load and unload the entire contents of his 48' to 53' dry van or refrigerated trailer~~ alone while an employee of the shipper or receiver merely verifies the count on the items delivered or shipped.

The sedentary nature of a driver's job, his diet, and his working hours create an individual who is most likely less physically fit and healthy than the average individual. Expecting this individual to lift, sort, and palletize anywhere from 20,000 to 45,000 pounds of cargo, alone, and then drive away alert and safety conscious is ludicrous. The result of this policy: accidents accidents accidents.

I believe the solution to this problem is a simple rule rather than an extensive regulatory policy. Shippers and receivers should be fined \$1000 for every pound of cargo on a truck if the truck driver is forced to load or unload. A toll free hot line should be established for truckers to report incidents of this driver abuse. A team of investigators should then be dispatched to arrive at the offending company, unannounced, and proceed immediately to the shipping/receiving area. Every person unloading or loading a truck should be identified immediately. If any drivers are found handling cargo, the shipper/receiver is immediately fined. The essence of this rule is to protect the public and truck drivers from trucking companies and shippers/receivers who do not take into account the impact on public safety of their cost reduction policies.

An exemption to this rule should be implemented when the driver is engaged in "local P&D (pick up and delivery) work" for a trucking company that does not send it's drivers more than 50

DOCKET MC-96-28-11
PAGE 2 OF 3

miles from their base terminal. It is the nature of the P&D drivers job to stop at many companies each day, picking up one or two packages at each.

Trucking companies, to their credit, recognize that driver loading and unloading of freight is one of the causes of driver turnover and are attempting to end the practice. Unfortunately, without government assistance, they do not have the economic power to confront the shippers/receivers.

Again, the government could take credit for implementation of this rule as part of a job creation effort. The jobs created would be low skill, but they would be a God send for many of the individuals displaced by the "high-tech global economy" who do not have the experience or education to find stable employment in the information age.

The shutdown of the ICC provides you administrators and legislators with the opportunity to develop America's transportation industry policy in essence from scratch. I am quite confident that you will formulate policy that emphasize the safety and standard of living of America's people. Good luck in your endeavors.

Sincerely

A handwritten signature in cursive script that reads "Glenn D. Port".

Glenn D. Port

DOCKET MC-96-28-11
PAGE 3 OF 3

①

TO WHOM IT MAY CONCERN,

I'm writing in response to your request

TO GET SOME INPUT FROM TRUCKERS IN REGARD TO UPCOMING POSSIBLE CHANGES
RELATED TO LOG BOOKS. FIRST, THANK YOU FOR THE INVITATION TO GIVE YOU SOME OF
MY IDEAS AND FEELINGS CONCERNING THE EVER PRESENT PROBLEM OF LOGS.

This subject is so complex its hard to
even BEGIN. Lets try it by me responding to some sample questions printed in the Dec
1996 issue of "OVERDRIVE" MAGAZINE, PAGE 8. (SEE ENCLOSED COPY)

(A) YOU MUST UNDERSTAND THAT EVERYONES BIOLOGICAL
MAKE-UP DIFFERS. I PERSONALLY COULD DRIVE TWENTY HOURS ONE DAY, THEN THE NEXT DAY,
EVEN WITH 12 HOURS OFF DUTY I COULD BEGIN TO DRIVE AND FEEL SLEEPY AFTER TWO HOURS.
EVERYDAY IS DIFFERENT. THE KEY TO SAFE DRIVING IS DRIVING WHEN THE BODY SAYS NAP.
FORCING A DRIVER TO STOP, BASED ON A FEDERAL REGULATION, WHEN HE OR SHE ISN'T READY IS
THE MOST UNSAFE THING YOU CAN DO. YOU CAN'T TELL A HUMAN BEING "THE LAW SAYS SLEEP NOW"
THE BODY MUST BE IN NEED OF SLEEP, OR IT WILL GET A FEW HOURS OF THE MOST RESTLESS
SLEEP, AND WORTHLESS SLEEP YOU COULD EVER IMAGINE.

(B) I DON'T EVEN UNDERSTAND THIS QUESTION!

(C) AGAIN, THE FMWA, THE PRESIDENT OF THE UNITED
STATES OR A POLICE OFFICER CAN'T DICTATE WHEN OR IF A HUMAN BEING SHOULD TAKE A BREAK.
BELIEVE ME, AS A PROFESSIONAL DRIVER, HE OR SHE WILL HEED THE CALL OF OUR BODIES. LET US
LOG OUR DAYS THE WAY WE ACTUALLY PERFORMED OUR DUTIES. YOU'D SEE THAT ONE DAY WE MIGHT
TAKE MANY BREAKS, THE NEXT DAY, NONE.

(D) IF THE MOTEL OR RESTAURANT IS A FIFTEEN MINUTE
OR LESS JOURNEY, OFF DUTY IS CERTAINLY THE ANSWER TO QUESTION (D)

(E) THESE INSTANCES, DUE TO THE FACT THAT WE'RE
TREATED LIKE SLAVES, MUST BE CONSIDERED OFF DUTY. BELIEVE ME, WHEN THERE IS STILL
MILES TO DRIVE, OTHER PICK-UPS OR DELIVERIES TO MAKE, THE MENTAL STRESS AND STRAIN
OF NOT BEING ABLE TO LOG THESE INSTANCES AS OFF DUTY AND HIT THE HIGHWAY WITH A
CLEAR CONSCIENCE AND A LOG BOOK THAT TELLS IT LIKE IT IS, IS ONE OF THE MOST UNSAFE
WAYS A DRIVER MUST PERFORM HIS DUTIES. (SEE PAGE TWO (a))

ADMINISTRATION
12-10-96
11:05
LEADS/REGS DIV.

BUCKET MC96-28-12
PAGE 1 OF 3

12-10-96

(2)

MENTAL STRESS, ANGUISH, STRAIN AND NERVOUSNESS OVER OUR LOGS IS THE SINGLE MOST TIRING PART OF THE DAY. LET US TELL IT, LOG IT, LIKE WE DID IT. AGAIN, EACH DAY, BIOLOGICALLY EXHAUSTING WILL BE DIFFERENT.

(F) AS YOU KNOW, THE EMANCIPATION PROCLAMATION WAS NEVER AMENDED TO INCLUDE TRUCKERS. WE CAN'T LET A DISRESPECTFUL SHIPPER OR RECEIVER ACTUALLY DETERMINE WHETHER OR NOT WE CAN GENERATE REVENUE TO PAY OUR BILLS AND FEED OUR FAMILIES. WE MUST BE ALLOWED TO LOG THIS TREATMENT OF OUR NATIONS MOST PATRIOTIC GROUP OF PEOPLE AS OFF DUTY.

IN CLOSING, I ASK YOU TO UNDERSTAND THE DIFFERENCE IN FATIGUE FACTORS OF TODAYS TRUCKS COMPARED TO YESTERYEARS FRED FLINTSTONE EQUIP. POWER STEERING, A/C, CRUISE CONTROL, AIR SEATS, AIR SUSPENSION, AIR RIDE CABS, ADEQUATE HORSEPOWER, QUALITY SOUND SYSTEMS ALLOW TODAYS DRIVERS TO WORK AND ENJOY EVERY MINUTE. PLEASE SET US FREE TO LOG OUR DAYS THE WAY THEY WENT AND REMOVE THE MENTAL STRESS AND STRAIN FROM EVERY WORKING MINUTE OF OUR WORKING LIVES CONCERNING LOG BOOKS.

PLEASE UNDERSTAND ALSO, IF THE WEATHER FORECAST SAYS ICE, SNOW, FOG, ETC TO BEGIN FOR EXAMPLE @ 4:00 PM COMING FROM THE WEST, LETS SAY, AND PER THE EXISTING LOG REGULATIONS I HAVENT COMPLETED MY 8 HOURS OFF AND I'M HEADING EAST, NORTH OR SOUTH YOU HAVE JUST ENDANGEROED NOT ONLY MY LIFE, BUT THE LIVES OF OUR NATIONS PEOPLE. I, AS A PROFESSIONAL, KNOW ITS BETTER TO LEAVE AND BEAT THE WEATHER, THEN TO SIT, PER YOUR REGULATIONS, TO LEAVE AS THE UNSAFE ROAD CONDITIONS COME INTO PLAY. AGAIN, LET US LOG OUR DAYS THE WAY THE DAY ENDED UP NEEDING TO BE LOGGED. PLEASE REMOVE THIS UNSAFE, TIRING, UNHEALTHY MENTAL STRAIN OF LOG BOOKS FROM OUR LIVES.

I've enjoyed TALKING WITH YOU THROUGH MY PEN. I'm 38 YEARS OLD, AN OWNER OPERATOR FREE OF ANY ACCIDENTS OR EVEN CARGO CLAIMS FOR 19 YEARS, OVER TWO MILLION MILES. IF YOU'D LIKE TO TOUCH ON OTHER ASPECTS OF TRUCKING CALL ME ON MY CELLPHONE 908-770-1158 OR AT HOME 609-259-9176. MY ADDRESS IS PO BOX 216 CLARKSBURG NJ 08510. Hey, Gotta Go, I think I'm OUT OF HOURS. ITS BEEN A PLEASURE, Sincerely, Kenneth E BRUSEWOLF *Kenneth E BrusewOLF* LIED TO TAKING TREATY ON NJ

DOCKET MC-96-28-12
PAGE 2 OF 3

Inside D.C.

Now is your chance to speak out on hours-of-service regulations / Merging CDL and medical card / Who is responsible for securing cargo?

Time to make your voice heard on log books

IF YOU WANT the hours-of-service rules changed, it's time to say so. The long-awaited proposed rule-making on hours of service was finally published in the Federal Register on election day, and you have until March 31, 1997, to respond.

The Federal Highway Administration has asked for answers to about 50 questions covering several issues related to hours-of-service regulations. For example:

- (A) • How many hours should you be able to drive after at least eight hours off-duty?
- (B) • Should nondriving duty time be counted differently from driving time?
- (C) • Should the FHWA require rest breaks during a long driving period? If so, how many and how long?
- (D) • Should the time spent traveling in your truck (bobtail or loaded) from terminals to motels and restaurants be considered driving time or off-duty time?
- (E) • How should the loading and unloading of freight, lumping and engaging in activities other than driving be addressed?
- (F) • How should delays at shippers and receivers be considered?

The entire list of questions and other information is included in 16 pages of the November 5 issue of the Federal Register.

Send your comments to Docket Clerk, Attn. FHWA Docket No. 96-28, FHWA, Room 4232, 400 Seventh St., SW, Washington, DC 20590. Try to offer specific examples and data to support your responses.

Washington Q&A

Q. Do federal regulations require me, the driver, to personally load, block, brace and tie down the cargo on the truck I'm driving?

A. No. The regulations don't require you personally to secure the cargo. As a CDL holder, you are required to know how to properly secure the cargo, and you're responsible for making sure the cargo is properly secured, whether you do it or someone else does.

Q. What's the age limit for having a CDL and driving a truck interstate?

A. Federal motor carrier safety regulations don't specify a maximum age limit for commercial drivers.

CDL/medical card merger proposal causes controversy

A decision on merging the CDL system and driver medical certification is taking some time. A group of 25 people is working on a system in which truck and bus drivers would carry a state-issued CDL that includes their medical certification. Drivers would not have a separate medical card. The group, which includes doctors, trucking industry representatives, government officials, insurance industry executives and safety advocates, has met four times to grapple with the issue.

Most industry representatives oppose the proposal, saying the current system works fine. Many are concerned that turning the process over to the states would mean 50 different ways of certifying medical qualifications, much as there are differences from state to state in the CDL process. State government officials say they don't have the resources to take over the additional work.

The Federal Highway Administration officials in charge of the negotiations say that, although the government has planned to merge the two systems ever since the CDL came into existence, they'll reconsider if there's enough evidence that a merger is not advisable. cl



By Washington Editor RITA BONTZ

Rita Bontz offers weekly D.C. updates on *Overdrive Online*, located on the Internet at <http://www.overdriveonline.com>, e-mail bontz@overdriveonline.com.

DOCKET

PAGE

ME 96-28-12

3 OF 3

12-11-96
Am

FEDERAL
ADMINISTRATION

96-28

Dear Sir:

I am writing concerning the hours of service for truck drivers. Please note that I do drive a truck. Most people want to blame the driver f & e problem. However most of the time the problem is with either the receiver or shipper. For example, a driver will go to the shipper and sit and wait for 4 to 6 hours to get loaded. The shipper then informs the driver that he has to have the commodity to the delivery point within 9 hours. The delivery point is 8 1/2 hours driving time away. The driver is told by his company that he is to be there on time. The driver cannot even stop to eat or get a shower, plus the fact that he has to drive when he would like to be sleeping. So the driver gets to the delivery point (on time). Upon arrival he is told that it is driver unload and he has to stack it a certain way on separate pallets and if he doesn't well he has to restack it. So the load he has takes 4 to 6 hours to off load. If the driver hires a lumper he has to pay the lumper to unload it. At most grocery warehouses in California you either unload it yourself or hire a lumper. The trucking company approves the hiring. One time I took a load into a particular grocery warehouse the company offered me \$75.00 to unload I said no.1 contacted the lumper he said \$150.00, the company never hesitated they said yes. Is my labor worth less than the lumper?

My point is if the shipper wants their goods delivered on time at an ungodly hour. Then the shipper should make sure that the commodity leaves at a reasonable time. This type of scenario is common , it happens every day, If a shipper denies it they are simply lying. At the delivery point we are treated like dirt, we are made to understand that we are the scumb of the earth. What I do not understand is the receiving company ordered the goods, it is there on time,(it should not be my responsibility to unload it) and I am made to feel and told, by there actions that they do not want me there. Nor do they even want the goods that was ordered by their company. When you leave the Los Angeles basin and have to have it in Sacramento in 8 hours it is legally impossible. If logged properly it takes 8 1/2 hours, yet at times we are told it has to be there within 8 hours. Where is my time for a break and for a shower and something to eat, because I have not been home in 2 or 3 days. You see I would like to stop by my house and see my wife and children and get a change of clothes and something to eat , shower etc. Most of the time I stop at my house and do what I need to do, and when I get sleepy I stop the truck and go to sleep. It is my responsibility to get the load there on time and be safe. I will be safe first and the delivery time comes second. Most drivers out here are like that. There are exceptions to every

DOCKET MC-96-28-13
PAGE 1 OF 2

rule, but most drivers work hard and are safe. If you will look at statistics you will see that , especially when you compare truck caused accidents to automobile caused accidents.

Why is it that I am compelled by law to keep a log book of my activities, and a person driving in car **from** New York to California is not? Surely they will drive over 10 hours a day and not get enough sleep. Hours of service need to be revised but it needs to be even handed, shipper and receiver need to get there act together.

Sincerely yours

Marvin Rose

1172 W. **Damron**

Tulare, Ca. **93274**

DOCKET mc-96-28-13
PAGE 2 OF 2